

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
R. Cameron Legg, Esq. OLIVER & LEGG, LLC 2240 Highway 33, Suite 112 Neptune, New Jersey 07753 732-988-1500 Attorney for Debtor courtdocs@oliverandlegg.com	
In Re:	
Richard S. Herro, Sr. Yvonne Herro	
	Debtors

Case No.: 24-22686

Chapter: 13

Hearing Date: May 14, 2025 @ 2pm

Judge: MBK

**CERTIFICATION OF DEBTOR'S COUNSEL
SUPPORTING SUPPLEMENTAL CHAPTER 13 FEE**

I, R. Cameron Legg, Esq., and the Law Offices of Oliver & Legg, LLC, represent the Debtor in the above captioned matter, and filed a Chapter 13 Debtor's Attorney Fee Application pursuant to D.N.J. LBR 2016-5(b)(3) and D.N.J. LBR 2016-1(e), and in support thereof states as follows:

1. I am seeking approval of legal fees in the amount of \$4,000.00.
2. An initial Disclosure of Chapter 13 Debtor's Attorney Compensation was filed with the Petition, disclosing a flat fee of \$4,750.00 for all legal services required to confirm a plan.
3. The Debtors signed a separate Retainer Agreement for legal representation in connection with negotiation of a loan modification on the first mortgage and home

equity line of credit of real property located at 2348 Orchard Crest Blvd.,
Manasquan, NJ 08736.

4. The Retainer Agreement required a flat, minimum fee of \$3,500.00.
5. The case was confirmed on April 8, 2025, with a provision in the plan to account for the balance of the legal fees associated with the loan modifications as an administrative, priority claim, subject to approval of this fee application.
6. As it stands, the Law Offices of Oliver & Legg have prepared and submitted a loan modification package to M&T Bank on October 4, 2024. A message has been received on April 7, 2025 indicating more documents have been requested.
7. Our office also prepared and submitted a loan modification to Shellpoint on October 15, 2024. On December 20, 2024, Debtors were offered trial loan modification. On April 4, 2025, Debtors signed the final loan modification.
8. Subsequent to confirmation, the Law Offices of Oliver & Legg, LLC, represented the Debtor in the following post-confirmation proceeding:
 - a. Preparation and prosecution of a Motion to Approve Final Loan Modification, filed on April 7, 2025.
9. The Debtor's retainer agreement provides for a flat fee of \$500.00 for filing of a motion.
10. It is requested the total of \$4,000.00 be approved by this Court and payable through the Debtor's Chapter 13 Plan as an administrative claim.
11. No compensation previously received has been shared with another person unless they are members of my law firm, and there is no agreement or understanding

between the applicant and any other entity for the sharing of compensation received or to be received for services rendered in or in connection with this case.

12. Pursuant to 11 U.S.C. § 331, I have not filed any fee applications in this case within the last 120 days.

I hereby certify under penalty of perjury that the foregoing is true and accurate to the best of my knowledge.

Dated: April 11, 2025

/s/ Cameron Legg
R. Cameron Legg, Esq.
Attorney for Debtor